Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of)		
Section 68.4 of the Commission's Rules Governing Hearing Aid-Compatible Telephones))) WT Docket No. 01-309
Cingular Wireless LLC Petition for Waiver of Section 20.19(c)(3)(i) of the Commission's) Rules))	

To: The Commission

COMMENTS OF RESEARCH IN MOTION LIMITED

Research In Motion Limited ("RIM") submits these comments in response to the Petition for Waiver of Section 20.19(c)(3)(i)(A) of the Commission's Rules governing hearing aid compatible ("HAC") telephones filed by Cingular Wireless LLC ("Cingular").

RIM supports Cingular's petition to waive requirements that it provide at least four handsets meeting a U3 or higher interference rating for the 850 MHz band until such time that the C63.19 standard is amended to reflect band differences above 1 GHz and below 1 GHz. RIM also supports Cingular's recommendation to use only the 1900 MHz U ratings for dual-band devices as an interim solution.

RIM agrees with Cingular that there are significant technological challenges inherent in achieving a U3 rating for handsets operating in the 850 MHz band under the current standard. RIM has been and will continue to be actively involved in seeking solutions to this issue directly as manufacturer, jointly with Cingular, and as part of the Alliance for Telecommunications Industry Solutions ("ATIS") Incubator Solutions 4 Working Group 9, which was established to evaluate hearing aid compatibility technical issues affecting wireless devices operating in 850 MHz and higher power technologies.

Sincerely,

R.E. Crow

Robert E. Crow Vice President, Industry, Government & University Relations Research In Motion Limited 295 Phillip Street Waterloo, Ontario N2L 3W8 7 September 2005